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Attorneys for Plaintiff  
United States of America

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

FELIPE RUIZ, and  
JOSE GABRIEL AGUIRRE,  
Defendants.

CASE NO: 1:25-CR-00079-JLT-SKO

AMENDED STIPULATION AND ORDER TO  
CONTINUE STATUS CONFERENCE AND  
REGARDING EXCLUDABLE TIME PERIODS  
UNDER SPEEDY TRIAL ACT

THE PARTIES HEREBY STIPULATE, through their respective attorneys of record, Assistant United States Attorney Brittany M. Gunter, counsel for the government, and Maritsa Flaherty, counsel for defendant Felipe Ruiz, and Ashli Summer McKeivier and Marc Days, counsel for defendant Jose Gabriel Aguirre, that this action's **Wednesday, June 18, 2025, status conference be continued to Wednesday, September 17, 2025, at 1:00 p.m.** The parties likewise ask the court to endorse this stipulation by way of formal order.

The parties base this stipulation on good cause. Specifically,

1. The grand jury returned an indictment regarding this matter on April 10, 2025. ECF 28.

Since that time, the parties agreed to and presented to the court a stipulation and proposed protective order regarding the production of third parties' personal information without

redactions, which the Court endorsed by way of formal order on April 17, 2025. ECF 39 and 40. The government then prepared and delivered an initial set of discovery to defense counsel within the time limits set forth by Eastern District of California Local Rule 440. The defense is and has been reviewing discovery thus far provided.

2. The government produced supplemental discovery to the defense on April 29, 2025. The government has additional supplemental discovery that it will mail out to the defense by June 13, 2025. If the government identifies additional information that should be produced as supplemental discovery, the government will promptly produce it in accord with Rule 16.
3. Defense counsel needs more time to complete its review of the discovery, conduct additional investigation, and communicate with the defendants about the case.
4. Defense counsel believes that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
5. The government does not object to the continuance.
6. The parties therefore stipulate that the period of time from June 18, 2025, through and including September 17, 2025, is excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the parties' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

Dated: June 11, 2025

MICHELE BECKWITH  
Acting United States Attorney

By: /s/ BRITTANY M. GUNTER  
BRITTANY M. GUNTER  
Assistant United States Attorney

Dated: June 11, 2025

By: /s/ MARITSA FLAHERTY  
MARITSA FLAHERTY  
Counsel for Felipe Ruiz

1 Dated: June 11, 2025

By: /s/ ASHLI SUMMER MCKEIVIER  
ASHLI SUMMER MCKEIVIER  
Counsel for Jose Gabriel Aguirre

4 Dated: June 11, 2025

By: /s/ MARC DAYS  
MARC DAYS  
Counsel for Jose Gabriel Aguirre

8 **ORDER**

9 IT IS ORDERED that the status conference currently set for June 18, 2025, at 1:00 pm is hereby  
10 continued to September 17, 2025, at 1:00 pm.

11 IT IS FURTHER ORDERED THAT the period of time from June 18, 2025, through and  
12 including September 17, 2025, is excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i)  
13 and (iv) because it results from a continuance granted by the Court at the parties' request on the basis of  
14 the Court's finding that the ends of justice served by taking such action outweigh the best interest of the  
15 public and the defendant in a speedy trial.

16 IT IS SO ORDERED.

18 Dated: 6/12/2025

Sheila K. Oberto  
HON. SHEILA K. OBERTO  
United States Magistrate Judge